

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS PENSION FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS HEALTH AND	)	
WELFARE FUND, TRUSTEES OF THE	)	
CHICAGO PAINTERS AND DECORATORS	)	
DEFERRED SAVINGS FUND, TRUSTEES OF	)	
THE CHICAGO PAINTERS AND	)	No. 16 C 4579
DECORATORS APPRENTICESHIP FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS SCHOLARSHIP FUND,	)	Judge Ellis
AND TRUSTEES OF THE CHICAGO	)	
PAINTERS AND DECORATORS JOINT	)	
COOPERATION TRUST FUND,	)	Magistrate Judge Rowland
	)	
Plaintiffs,	)	
v.	)	
	)	
DANIEL DECORATING, INC., an	)	
Illinois corporation	)	
	)	
Defendant.	)	

**MOTION FOR JUDGMENT IN SUM CERTAIN**

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, GRANT R. PIECHOCINSKI and ARNOLD and KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter Judgment in Sum Certain in favor of Plaintiffs and against Defendant, DANIEL DECORATING, INC., an Illinois corporation. In support of their motion, Plaintiffs state as follows:

1. This case was filed on April 22, 2016.
2. The summons was served on April 30, 2016, and the answer was due on May 23, 2016.
3. Defendant has not filed an answer or otherwise plead.

4. According to the affidavit of Richard J. Wolf, attached as Exhibit A, Defendant owes \$726,103.12 in contributions, \$108,915.46 in liquidated damages on the audit, and \$1,900.00 in audit costs. Additionally, the Defendant owes \$10,625.69 in accumulated unpaid liquidated damages for the period from May 2014 through February 2016.

5. The total due to the Plaintiffs for the audit for the period of January 1, 2013 through December 31, 2015 and for outstanding liquidated damages through February 2016 is \$847,544.27.

**WHEREFORE**, Plaintiffs move this Court to:

A. Enter final judgment in favor of the Plaintiffs and against the Defendant Daniel Decorating, Inc., in the amount of \$847,544.27. (A copy of a proposed order is attached as Exhibit B)

Respectfully submitted,

**TRUSTEES OF THE CHICAGO PAINTERS  
AND DECORATORS PENSION FUND, et al.,**

By: /s/ Grant R. Piechocinski  
One of their Attorneys

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